

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DIVISION OF TEXAS
HOUSTON DIVISION**

COREY SPILLER,)(Civil Action No.:4:20-cv-3878
)((Jury Trial)
<i>Plaintiff,</i>)(
)(
V.)(
)(
HARRIS COUNTY, TEXAS, <i>et al.</i>)(
)(
<i>Defendants.</i>)(

PLAINTIFF’S INITIAL DISCLOSURES

Plaintiff now serves his Initial Disclosures pursuant to FED. R. CIV. P. 26, as follows:

(1) Fed. R. Civ. P. 26 (a)(1)(A)(i): the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

The following individuals are believed to have personal knowledge regarding events related to the Plaintiffs’ claims in this lawsuit:

Corey Spiller
c/o Randall Kallinen
511 Broadway St
Houston, Texas 77012
attorneykallinen@aol.com
Plaintiff in this proceeding.

Corey Spiller’s girlfriend who was an eyewitness.

Harris County
Harris County Constable Precinct 7
Constable May Walker
c/o Suzanne Bradley
Assistant County Attorney
1019 Congress, 15th Floor
Houston, Texas 77002

May Walker is a defendant has knowledge of policies, customs and practices of excessive force, training, and discipline.

Jared Lindsay
c/o Jim Butt
Assistant County Attorney
1019 Congress, 15th Floor
Houston, Texas 77002

Defendant in this proceeding and has knowledge as to the alleged incident on which this lawsuit is based.

Other Precinct 7 officers at the scene and on the body camera video.

(2) Fed. R. Civ. P. 26 (a)(1)(A)(ii): a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Body camera video of Jared Lindsay.
Court records of Plaintiff equally available to all parties.
Criminal defense attorney payment records.

(3) Fed. R. Civ. P. 26 (a)(1)(A)(iii): a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

Plaintiff claims damages for anxiety, fear, embarrassment lost sleep, and other mental anguish and request a minimum of \$1,000,000.00.

Plaintiffs request reasonable attorney's fees and expenses using \$550 per hour as a reasonable rate multiplied by hours worked.

Criminal defense attorney's fees.

(4) Fed. R. Civ. P. 26 (a)(1)(A)(iv): for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

NA.

(5) Fed. R. Civ. P. 26 (a)(1)(D)(2): In addition to the disclosures required by Rule 26(a)(1), a party must disclose to the other parties the identity of any witness it may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705;

Plaintiff has not yet designated experts but will in accordance with any court order. Randall L. Kallinen will be an expert on attorney's fees and expenses.

Respectfully Submitted,

/s/ Randall L. Kallinen

Randall L. Kallinen

Kallinen Law PLLC

U.S. Southern District of Texas Bar No.:19417

State Bar of Texas No. 00790995

511 Broadway Street

Houston, Texas 77012

Telephone: 713.320.3785

FAX: 713.893.6737

E-mail: AttorneyKallinen@aol.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on this February 20, 2021 a true and correct copy of the foregoing pleading was delivered in accordance with the Federal Rules of Civil Procedure to all ECF notice attorneys of record and filed via ECF which sends to all ECF notice attorneys.

/s/ Randall L. Kallinen

Randall L. Kallinen